

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Kathleen Hartnett White, *Commissioner*
Margaret Hoffman, *Executive Director*



T / F (IHW) 63003 CO RP
CAS DOC #
PROJ. MGR A. Posnick

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 21, 2002

Mr. David Dodge
DERA Program Manager
Directorate of Environment
Headquarters, U.S. Army Air Defense Artillery Center and Fort Bliss
1733 Pleasanton Road
Fort Bliss, Texas 79916-6816

Re: Ft. Bliss
~~TCEQ Solid Waste Registration No. 63003~~
TCEQ Hazardous Waste Permit No. HW-50296
EPA ID No. TX4213720101
Final Response Action Completion Report for Rubble Dump Site (SWMU 16) Near Site Monitor,
dated March 2001
Ft. Bliss Response Letter to Request for Additional Information, dated November 1, 2002
Approval of Response Action Completion Report - No Further Action Required
Texas Risk Reduction Program Remedy Standard A - Residential

Dear Mr. Dodge:

The (TCEQ) received your Remedial Action Completion Report (RACR) on April 12, 2001, indicating that remediation activities have been completed in accordance with the TCEQ Texas Risk Reduction Program (TRRP) Remedy Standard A - Residential pursuant to Title 30 Texas Administrative Code (TAC) Chapter 350.

In order to attain TRRP Remedy Standard A, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health and ecological based standards and criteria. In order to be released from the requirement to file an institutional control in accordance with 30 TAC §350 Subchapter F, contaminants that remain in place in media of concern (i.e., soil, ground water, surface water, air) must not exceed residential protective concentration levels (PCLs).

The TCEQ has completed a review of the RACR. In addition, the TCEQ has also reviewed the Ft. Bliss letter of November 1, 2002, received on November 8, 2002, which includes the laboratory data sheet for the Synthetic Precipitation Leaching Procedure (SPLP) results for the soil sample with the highest concentrations of lead and cadmium. TCEQ requested this information (which had been omitted from the RACR) via e-mail communication on October 28, 2002. The RACR documentation indicates that TRRP Remedy Standard A Residential PCLs have been achieved at the Rubble Dump Site (SWMU 16) such that no institutional control or post-closure care is required. Ft. Bliss is released from filing an institutional control and from post-closure care requirements. In addition, TCEQ has received your publisher's affidavit stating that Fort Bliss published notice of corrective measures (complete removal of all contaminants) for the Rubble Dump Site (SWMU)-016, on June 2, 2002, in the El Paso Times. TCEQ did not receive any comments during the sixty

Mr. David Dodge
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Page 2

day comment period. With fulfillment of the public notice requirements, TCEQ can issue final approval for remediation of the Rubble Dump Site.

Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual remediation fails to comply with these requirements, the burden remains upon Ft. Bliss to take any necessary and authorized action to correct such conditions. A TCEQ field inspector may review your Final Report and conduct a closure inspection of the site.

Questions concerning this letter should be directed to me at (512) 239-2332. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TCEQ Region 6 Office in El Paso. The TCEQ Solid Waste Registration Number and Unit Description should be referenced in all submittals.

Sincerely,



Allan Posnick
DSMOA Program Manager
Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

AP/ap

cc: Waste Program Manager, TCEQ Region 6 Office, El Paso



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, U. S. ARMY GARRISON COMMAND
2 SHERIDAN ROAD
FORT BLISS, TEXAS 79916-6816

T/F/THW 63003 CO RP
CAS DOC # 18291
PROJ. MGR A Posnick

ATZC-DOE (200)

1 November 2002

MEMORANDUM FOR:

Mr. Allan Posnick
TCEQ (MC-127)
Corrective Action Section
12100 Park 35 Circle, Building D
Austin, Texas 78753

Received

NOV 08 2002
Remediation Division
Corrective Action Section

SUBJECT: Request for Additional Information, RACR, Rubble Dump Site, SWMU 16, FTBL-028

1. Reference, your email message, subject as above, dated October 28, 2002 (attached).
2. You requested additional information on Section 3.5.2, Verification Sample Results, page 3-5, specifically results of the Synthetic Precipitation Leaching Procedures with results below the PQL. Those results are included in Table 2, under sample RDS-10V in parentheses..
3. Additionally we are inclosing the laboratory data sheet for the SPLP results, which should be added behind the data validation, write up in Appendix F.
4. Thank you for your assistance. You may reach me at 915-568-7979, or dodged@bliss.army.mil if you have any further questions.

Sincerely,

David Dodge, REM
DERA Program Manager
Directorate of Environment

DD/dd

Incl: Copy of 10-28-02 email
SPLP Laboratory Data sheet.

Cf. File, FTBL-028, SWMU 16 Rubble Dump Site

Dodge, David (Contractor)

From: Allan Posnick [APOSNICK@tceq.state.tx.us]
Sent: Monday, October 28, 2002 12:23 PM
To: DodgeD@emh10.bliss.army.mil
Subject: RACR for Rubble Dump Site

David, I would like to approve the RACR for the Rubble Dump Site but it appears to be lacking one piece of info I would need to approve it. In section 3.5.2 Verification Sample Result, page 3-5 it says that samples with highest concentrations of metals were further tested by the Synthetic Precipitation Leaching Procedures with results below the PQL. I don't believe those results were included in the report. Since some of the totals for lead and cadmium exceeded the soil to gw PCL the SPLP results should have been included. Once I get that info I can send out my letter. Please let me know if you have any questions about this. Thanks, Allan

SEVERN TRENT LABORATORIES ANALYTICAL REPORT

JOB NUMBER: 201609

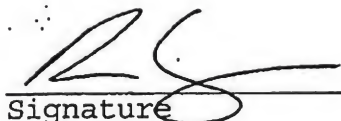
Prepared For:

Roy F. Weston, Inc.
5599 San Felipe
Suite 700
Houston, TX 77056-2721

Project: Ft. Bliss: Montana Road Site

Attention: Greg Braddy

Date: 02/02/2001



Signature

Name: Richard C. Wright

Title: Project Manager



2/2/01

Date

STL Chicago
2417 Bond Street
University Park, IL 60466

PHONE: (708) 534-5200
FAX...: (708) 534-5211

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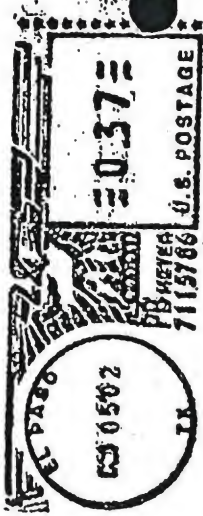
INORGANIC ANALYSES DATA SHEET

RDS10V

US Army Garrison
Attn: ATZC-DOE (Dodge)
Bldg 624, Taylor @ Pleasonton
Fort Bliss, Texas 79916

Received
NOV 8 2002
Remediation Division
Corrective Action Section

Mr. Allan Posnick
TCEQ (MC-127)
Corrective Action Section
12100 Park 35 Circle, Building D
Austin, Texas 78753



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